Appl. No. 10/041,033 Amdt. dated September 13, 2005 Reply to Office Action of March 24, 2005

## **REMARKS/ARGUMENTS**

Upon entry of this amendment, which amends claims 1, 10, 19, 28, 36, and 37, and adds new claim 38, claims 1-38 will remain pending.

In the Office Action, claims 1-37 were rejected under 35 U.S.C. §102(e) as being anticipated by Chinchar et al. (U.S. Patent No. 6,675,178, hereinafter "Chinchar"). Applicants respectfully request reconsideration of the claims in view of the amendments above and remarks below.

Applicants thank the Examiner for the courtesy of the interview conducted on August 3, 2005 and the review of the proposed amendments to the claims.

## Section 102 Rejections

Claim 1 was rejected under 35 U.S.C. §102(e) as being anticipated by Chinchar.

As discussed during the Interview, Chinchar does not disclose or suggest every element of claim 1, as amended. For example, Chinchar fails to disclose or suggest:

a data cache located in memory of the system, wherein data stored in the data cache <u>facilitates faster computations</u> on the data stored in the data cache than if the data is stored in a database, wherein the data cache is coupled to a first set of data stored in a database and a second set of data stored in memory of the system, wherein the data cache is configured to perform a scan operation on at least a portion of the first set of data and an update operation on the second set of data with changes that have occurred in the first set of data;

an engine manager coupled to the data cache and configured to instruct the data cache to perform the scan and update operations; and a solver coupled to the data cache and configured to perform one

or more computations on the updated second set of data stored in the data cache, the <u>updated second set of data including the changes that have occurred in the first set of data.</u>

As discussed during the Interview, Chinchar is directed towards mirroring data between a first database and a second database. See *Chinchar*, Fig. 1. A second processing system executes one or more transactions defined by transactional data in the second transactional database 32 and the revised configuration data in the second configuration database

34. See *Chinchar*, col. 13, lines 44-48. In contrast to Chinchar, claim 1 recites a data cache located in memory of the system where data stored in the data cache facilitates <u>faster</u> computations on the data stored in the data cache than if the data is stored <u>in a database</u>. Further, in contrast to Chinchar, claim 1 recites that one or more computations are performed on the updated second set of data stored in the data cache, the updated second set of data including the changes that have occurred in the first set of data. Accordingly, Chinchar does not disclose or suggest a data cache that facilitates faster computations and updating the data cache with updates from the first set of data and performing one or more computations on the updated second set of data stored in the data cache. Rather, Chinchar performs computations on data in databases 32 and 34.

Embodiments of the present invention provide many advantages. For example, data in the data cache can be accessed quickly to facilitate rapidly performing memory-intensive computations. Also, because changes that occurred in the first set of data are updated in the second set of data, an efficient process of copying the changes is provided.

Accordingly, applicants respectfully request withdrawal of rejection of claim 1. Claims 2-9 depend from claim 1 and thus derive patentability at least therefrom.

Applicants submit claims 10, 19, 28, 36, and 37 should be allowable for at least a similar rationale as discussed with respect to claim 1. Claims 11-18 depend from claim 11; claims 20-27 depend from claim 19; claims 29-35 depend from claim 28, and thus derive patentability at least therefrom. Accordingly, applicants respectfully request withdrawal of the rejections.

## New Claim 38

Applicants submit that the cited references do not disclose or suggest every element of new claim 38. For example, the set of references do not disclose or suggest an engine manager configured to determine if a first set of data has changed since the last update operation, wherein if the first set of data has changed, the engine manager is configured to perform a second update on the second set of data in the data cache with changes to the first set of data since the last update operation and wherein a solver is configured to re-perform one or more computations

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on the updated second set of data stored in the data cache including the changes that have occurred in the second set of data since the last update operation.

## **CONCLUSION**

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 415-576-0200.

Respectfully submitted,

Dated:

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